

Exhibit 2

From: SALEM, Sara <Sara.Salem@freshfields.com>
Sent: Friday, April 26, 2024 8:02 PM
To: Geraldine W. Young; GARRETT, Tyler; dpearl@axinn.com; Audrey Moore; jhunsberger@axinn.com; SESSIONS, Justina (JKS); Bradley Justus; Paul Yetter; Bracewell, Mollie; MAHR, Eric (EJM); MCCALLUM, Robert; ELMER, Julie (JSE); Daniel Bitton; Ali Vissichelli; Bryce Callahan; EWALT, Andrew (AJE); VACA, Lauren
Cc: Zeke DeRose III; Jonathan.Wilkerson; Alex J. Brown; Marc B. Collier; John McBride; Peter M. Hillegas; Trevor.Young; Noah Heinz; Zina Bash; Joseph M. Graham Jr.; Ashley Keller; Brooke Smith; jdugan@dugan-lawfirm.com; Isabela Pena-Gonzalez; NRRAdTech; James R. Hall; Melonie DeRose; LARITZ, Tina; BOSCO, Veronica
Subject: RE: State of Texas v Google - Deposition Notices

Counsel –

██████████ is available for a deposition on the noticed date, Friday May 3, 2024 at 9am ET either remotely or in person in Atlanta, Georgia. Please let us know whether Plaintiffs intend to proceed remotely or in person.

██████████ is available for a deposition on the noticed date, Friday May 3, 2024 at 9am ET either remotely or in person in New York. Please let us know whether Plaintiffs intend to proceed remotely or in person.

As noted in our April 22, 2024 letter, Google's counsel does not represent ██████████ and we cannot accept service of a deposition notice or subpoena. Ms. ██████████'s last known address is 520 8th St, Brooklyn, NY 11215.

Best,
Sara

Sara Salem
Senior Associate
T +1 202 777 4529 | M +1 202 853 0381

From: SALEM, Sara
Sent: Thursday, April 25, 2024 9:32 PM
To: Geraldine W. Young <geraldine.young@nortonrosefulbright.com>; GARRETT, Tyler <Tyler.Garrett@freshfields.com>; dpearl@axinn.com; Audrey Moore <Audrey.Moore@LanierLawFirm.com>; jhunsberger@axinn.com; SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; Daniel Bitton <dbitton@axinn.com>; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; VACA, Lauren <Lauren.VACA@freshfields.com>
Cc: Zeke DeRose III <zeke.derosé@lanierlawfirm.com>; Jonathan.Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Trevor.Young <Trevor.Young@oag.texas.gov>; Noah Heinz <Noah.Heinz@kellerpostman.com>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; jdugan@dugan-lawfirm.com; Isabela Pena-Gonzalez <isabela.pena-gonzalez@nortonrosefulbright.com>; NRRAdTech <NRRAdTech@nortonrosefulbright.com>; James R. Hall <james.hall@nortonrosefulbright.com>; Melonie DeRose <Melonie.DeRose@LanierLawFirm.com>; LARITZ, Tina <Tina.LaRitz@freshfields.com>
Subject: RE: State of Texas v Google - Deposition Notices

Counsel –

██████████ will be available for a deposition next Thursday, May 2 at 10am PT either remotely or in person in Los Angeles, California. Please let us know whether Plaintiffs intend to proceed remotely or in person.

Thanks,
Sara

Sara Salem

Senior Associate

T +1 202 777 4529 | M +1 202 853 0381

From: SALEM, Sara

Sent: Thursday, April 25, 2024 2:12 PM

To: Geraldine W. Young <geraldine.young@nortonrosefulbright.com>; GARRETT, Tyler <Tyler.Garrett@freshfields.com>; dpearl@axinn.com; Audrey Moore <Audrey.Moore@LanierLawFirm.com>; jhunsberger@axinn.com; SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; Daniel Bitton <dbitton@axinn.com>; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; VACA, Lauren <Lauren.VACA@freshfields.com>

Cc: Zeke DeRose III <zeke.derose@lanierlawfirm.com>; Jonathan.Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Trevor.Young <Trevor.Young@oag.texas.gov>; Noah Heinz <Noah.Heinz@kellerpostman.com>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; jdugan@dugan-lawfirm.com; Isabela Pena-Gonzalez <isabela.pena-gonzalez@nortonrosefulbright.com>; NRFAdTech <NRFAdTech@nortonrosefulbright.com>; James R. Hall <james.hall@nortonrosefulbright.com>; Melonie DeRose <Melonie.DeRose@LanierLawFirm.com>; LARITZ, Tina <Tina.LaRitz@freshfields.com>

Subject: RE: State of Texas v Google - Deposition Notices

Yes, Mr. ████████'s May 2 start time should be **9am ET** (not PT) and we understand that Plaintiffs and the court reporter/videographer will be remote. Thank you for confirming.

Sara Salem

Senior Associate

T +1 202 777 4529 | M +1 202 853 0381

From: Geraldine W. Young <geraldine.young@nortonrosefulbright.com>

Sent: Thursday, April 25, 2024 1:46 PM

To: SALEM, Sara <Sara.Salem@freshfields.com>; GARRETT, Tyler <Tyler.Garrett@freshfields.com>; dpearl@axinn.com; Audrey Moore <Audrey.Moore@LanierLawFirm.com>; jhunsberger@axinn.com; SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; Daniel Bitton <dbitton@axinn.com>; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; VACA, Lauren <Lauren.Vaca@freshfields.com>

Cc: Zeke DeRose III <zeke.derose@lanierlawfirm.com>; Jonathan.Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>;

Trevor.Young <Trevor.Young@oag.texas.gov>; Noah Heinz <Noah.Heinz@kellerpostman.com>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; jdugan@dugan-lawfirm.com; Isabela Pena-Gonzalez <isabela.pena-gonzalez@nortonrosefulbright.com>; NRRAdTech <NRRAdTech@nortonrosefulbright.com>; James R. Hall <james.hall@nortonrosefulbright.com>; Melonie DeRose <Melonie.DeRose@LanierLawFirm.com>; LARITZ, Tina <Tina.LaRitz@freshfields.com>

Subject: RE: State of Texas v Google - Deposition Notices

Thank you for confirming, we will start with Ms. [REDACTED] at 10 am ET (not 9 am ET).

We had a question too regarding Mr. [REDACTED]'s start time on 5/2/2024 – you all had listed him as starting at 9 am PT. Should that be 9 am ET, given he is in NY?

From: SALEM, Sara <Sara.Salem@freshfields.com>

Sent: Thursday, April 25, 2024 12:10 PM

To: Geraldine W. Young <geraldine.young@nortonrosefulbright.com>; GARRETT, Tyler <Tyler.Garrett@freshfields.com>; dpearl@axinn.com; Audrey Moore <Audrey.Moore@LanierLawFirm.com>; jhunsberger@axinn.com; SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; Daniel Bitton <dbitton@axinn.com>; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; VACA, Lauren <Lauren.Vaca@freshfields.com>

Cc: Zeke DeRose III <zeke.derose@lanierlawfirm.com>; Jonathan.Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Trevor.Young <Trevor.Young@oag.texas.gov>; Noah Heinz <Noah.Heinz@kellerpostman.com>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; jdugan@dugan-lawfirm.com; Isabela Pena-Gonzalez <isabela.pena-gonzalez@nortonrosefulbright.com>; NRRAdTech <NRRAdTech@nortonrosefulbright.com>; James R. Hall <james.hall@nortonrosefulbright.com>; Melonie DeRose <Melonie.DeRose@LanierLawFirm.com>; LARITZ, Tina <Tina.LaRitz@freshfields.com>

Subject: RE: State of Texas v Google - Deposition Notices

Hi Geraldine –

Thank you for the confirmation on Mr. [REDACTED].

With respect to Ms. [REDACTED], Google has completed its production of Ms. [REDACTED]'s custodial documents. Ms. [REDACTED] is available to start at your requested 10am ET start time (not 9am) for up to seven hours on the record.

Best,
Sara

Sara Salem

Senior Associate

T +1 202 777 4529 | M +1 202 853 0381

From: Geraldine W. Young <geraldine.young@nortonrosefulbright.com>

Sent: Thursday, April 25, 2024 12:12 PM

To: GARRETT, Tyler <Tyler.Garrett@freshfields.com>; dpearl@axinn.com; SALEM, Sara <Sara.Salem@freshfields.com>; Audrey Moore <Audrey.Moore@LanierLawFirm.com>; jhunsberger@axinn.com; SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>;

Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; Daniel Bitton <dbitton@axinn.com>; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; VACA, Lauren <Lauren.Vaca@freshfields.com>
Cc: Zeke DeRose III <zeke.derose@lanierlawfirm.com>; Jonathan.Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Trevor.Young <Trevor.Young@oag.texas.gov>; Noah Heinz <Noah.Heinz@kellerpostman.com>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; jdugan@dugan-lawfirm.com; Isabela Pena-Gonzalez <isabela.pena-gonzalez@nortonrosefulbright.com>; NRFAdTech <NRFAdTech@nortonrosefulbright.com>; James R. Hall <james.hall@nortonrosefulbright.com>; Melonie DeRose <Melonie.DeRose@LanierLawFirm.com>; LARITZ, Tina <Tina.LaRitz@freshfields.com>
Subject: RE: State of Texas v Google - Deposition Notices

We plan to proceed in person with Mr. [REDACTED]'s deposition and with exhibit share, so please ensure he has access to a laptop and wifi.

Regarding Ms. [REDACTED]'s deposition scheduled for tomorrow, we have cleared our conflict and can start at her preferred time of 9 am ET. We, however, have not received confirmation from you on the following requested yesterday: We also request that you confirm that Google has completed its production of custodial documents and all related metadata for Ms. [REDACTED] (as well as for all upcoming scheduled depositions including Mr. [REDACTED]). Please also confirm we will be able to depose Ms. [REDACTED] for up to 7 hours on the record. If you can send us those confirmations, we will forward link today when we get it.

Thanks, Geraldine

From: GARRETT, Tyler <Tyler.Garrett@freshfields.com>

Sent: Thursday, April 25, 2024 10:13 AM

To: dpearl@axinn.com; Geraldine W. Young <geraldine.young@nortonrosefulbright.com>; SALEM, Sara <Sara.Salem@freshfields.com>; Audrey Moore <Audrey.Moore@LanierLawFirm.com>; jhunsberger@axinn.com; SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; Daniel Bitton <dbitton@axinn.com>; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; VACA, Lauren <Lauren.Vaca@freshfields.com>

Cc: Zeke DeRose III <zeke.derose@lanierlawfirm.com>; Jonathan.Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Trevor.Young <Trevor.Young@oag.texas.gov>; Noah Heinz <Noah.Heinz@kellerpostman.com>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; jdugan@dugan-lawfirm.com; Isabela Pena-Gonzalez <isabela.pena-gonzalez@nortonrosefulbright.com>; NRFAdTech <NRFAdTech@nortonrosefulbright.com>; James R. Hall <james.hall@nortonrosefulbright.com>; Melonie DeRose <Melonie.DeRose@LanierLawFirm.com>; LARITZ, Tina <Tina.LaRitz@freshfields.com>

Subject: RE: State of Texas v Google - Deposition Notices

Hi Geraldine,

Can you please confirm whether Plaintiffs intend to proceed remotely or in-person (Freshfields' Redwood City office, 855 Main St, Redwood City, CA 94063) for [REDACTED]'s deposition on May 1 beginning at 9am PT?

Best,
Tyler

From: Pearl, David <dpearl@axinn.com>

Sent: Wednesday, April 24, 2024 8:26 PM

To: Geraldine W. Young <geraldine.young@nortonrosefulbright.com>; SALEM, Sara <Sara.Salem@freshfields.com>; Audrey Moore <Audrey.Moore@LanierLawFirm.com>; jhunsberger@axinn.com; SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; Daniel Bitton <dbitton@axinn.com>; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; VACA, Lauren <Lauren.Vaca@freshfields.com>
Cc: Zeke DeRose III <zeke.derose@lanierlawfirm.com>; Jonathan.Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Trevor.Young <Trevor.Young@oag.texas.gov>; Noah Heinz <Noah.Heinz@kellerpostman.com>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; jdugan@dugan-lawfirm.com; Isabela Pena-Gonzalez <isabela.pena-gonzalez@nortonrosefulbright.com>; NRFAdTech <NRFAdTech@nortonrosefulbright.com>; James R. Hall <james.hall@nortonrosefulbright.com>; Melonie DeRose <Melonie.DeRose@LanierLawFirm.com>; GARRETT, Tyler <Tyler.Garrett@freshfields.com>; LARITZ, Tina <Tina.LaRitz@freshfields.com>

Subject: RE: State of Texas v Google - Deposition Notices

All,

██████████ will be available for a deposition next Wednesday, May 1, at 9 AM ET, either remotely or in person in New York. If you would like to take his deposition in person, we will follow up with the exact location.

Thanks,

David

David Pearl
Partner

AXINN

Axinn, Veltrop & Harkrider LLP
1901 L Street NW
Washington, DC 20036
Office 202.469.3514
Mobile 310.733.8444
dpearl@axinn.com
Axinn.com

55 Second Street
San Francisco, CA 94105

Pronouns | He, Him, His

From: Geraldine W. Young <geraldine.young@nortonrosefulbright.com>

Sent: Wednesday, April 24, 2024 4:46 PM

To: SALEM, Sara <Sara.Salem@freshfields.com>; Audrey Moore <Audrey.Moore@LanierLawFirm.com>; Pearl, David <dpearl@axinn.com>; Hunsberger, James K. <jhunsberger@axinn.com>; SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Justus, Bradley <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; Bitton, Daniel S. <dbitton@axinn.com>; Vissichelli, Allison M. <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; VACA, Lauren <Lauren.Vaca@freshfields.com>

Cc: Zeke DeRose III <zeke.derose@lanierlawfirm.com>; Jonathan.Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Trevor.Young <Trevor.Young@oag.texas.gov>; Noah Heinz <Noah.Heinz@kellerpostman.com>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; jdugan@dugan-lawfirm.com; Isabela Pena-Gonzalez <isabela.pena-gonzalez@nortonrosefulbright.com>; NRFAdTech <NRFAdTech@nortonrosefulbright.com>; James R. Hall <james.hall@nortonrosefulbright.com>; Melonie DeRose <Melonie.DeRose@LanierLawFirm.com>; GARRETT, Tyler <Tyler.Garrett@freshfields.com>; LARITZ, Tina <Tina.LaRitz@freshfields.com>

Subject: RE: State of Texas v Google - Deposition Notices

Caution: External Email

Caution: External Email

Counsel:

You have provided us less than 48 hours' notice of Ms. [REDACTED]'s deposition. We request that for any future depositions that we be provided at least 3 days' notice. As you know, there are still a number of 30(b)(1) and 30(b)(6) depositions and topics that have not been scheduled.

We also request that you confirm that Google has completed its production of custodial documents and all related metadata for Ms. [REDACTED] (as well as for all upcoming scheduled depositions including Mr. [REDACTED]).

If that is the case, we will take Ms. [REDACTED]'s deposition remotely on Friday April 26 but request a slightly later start time at 10 am ET (which is still less than 48 hours from your email below), due to pre-existing conflicts on our end. Please confirm that start time will work and we will be able to depose Ms. [REDACTED] for up to 7 hours on the record, and we will make the arrangements and send you all the zoom link for the deposition.

Thank you,
Geraldine

From: SALEM, Sara <Sara.Salem@freshfields.com>

Sent: Wednesday, April 24, 2024 11:46 AM

To: Audrey Moore <Audrey.Moore@LanierLawFirm.com>; dpearl@axinn.com; jhunsberger@axinn.com; SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE)

<Julie.Elmer@freshfields.com>; Daniel Bitton <dbitton@axinn.com>; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; VACA, Lauren <Lauren.Vaca@freshfields.com>
Cc: Zeke DeRose III <zeke.derose@lanierlawfirm.com>; Jonathan.Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Trevor.Young <Trevor.Young@oag.texas.gov>; Noah Heinz <Noah.Heinz@kellerpostman.com>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; jdugan@dugan-lawfirm.com; Isabela Pena-Gonzalez <isabela.pena-gonzalez@nortonrosefulbright.com>; Geraldine W. Young <geraldine.young@nortonrosefulbright.com>; NRFAdeTech <NRFAdeTech@nortonrosefulbright.com>; James R. Hall <james.hall@nortonrosefulbright.com>; Melonie DeRose <Melonie.DeRose@LanierLawFirm.com>; GARRETT, Tyler <Tyler.Garrett@freshfields.com>; LARITZ, Tina <Tina.LaRitz@freshfields.com>
Subject: RE: State of Texas v Google - Deposition Notices

[External Email – Use Caution]

Counsel –

██████████ is available for a deposition on April 26, 2024 beginning at 9am ET remotely or at Freshfields New York office.

Best,
Sara

Sara Salem
Senior Associate
T +1 202 777 4529 | M +1 202 853 0381

From: SALEM, Sara
Sent: Monday, April 22, 2024 1:31 PM
To: Audrey Moore <Audrey.Moore@LanierLawFirm.com>; dpearl@axinn.com; jhunsberger@axinn.com; SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; Daniel Bitton <dbitton@axinn.com>; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; VACA, Lauren <Lauren.VACA@freshfields.com>
Cc: Zeke DeRose III <Zeke.DeRose@LanierLawFirm.com>; Jonathan.Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Trevor Young <trevor.young@oag.texas.gov>; Noah Heinz <Noah.Heinz@kellerpostman.com>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; jdugan@dugan-lawfirm.com; Isabela Pena-Gonzalez <isabela.pena-gonzalez@nortonrosefulbright.com>; Geraldine W. Young <geraldine.young@nortonrosefulbright.com>; NRFAdeTech@nortonrosefulbright.com; James R. Hall <james.hall@nortonrosefulbright.com>; Melonie DeRose <Melonie.DeRose@LanierLawFirm.com>; GARRETT, Tyler <Tyler.Garrett@freshfields.com>
Subject: RE: State of Texas v Google - Deposition Notices

Counsel –

I write with an update on [REDACTED]'s availability. Mr. [REDACTED] is available for a deposition on May 1, 2024 beginning at 9am PT remotely or at Freshfields Redwood City office.

Best,
Sara

Sara Salem

Senior Associate

T +1 202 777 4529 | M +1 202 853 0381

From: Audrey Moore <Audrey.Moore@LanierLawFirm.com>

Sent: Wednesday, April 17, 2024 8:16 PM

To: dpearl@axinn.com; jhunsberger@axinn.com; SALEM, Sara <Sara.Salem@freshfields.com>; SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; Daniel Bitton <dbitton@axinn.com>; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; VACA, Lauren <Lauren.Vaca@freshfields.com>

Cc: Zeke DeRose III <Zeke.DeRose@LanierLawFirm.com>; Jonathan Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Trevor Young <trevor.young@oag.texas.gov>; Noah Heinz <Noah.Heinz@kellerpostman.com>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; jdugan@dugan-lawfirm.com; Isabela Pena-Gonzalez <isabela.pena-gonzalez@nortonrosefulbright.com>; Geraldine W. Young <geraldine.young@nortonrosefulbright.com>; NRFAdTech@nortonrosefulbright.com; James R. Hall <james.hall@nortonrosefulbright.com>; Melonie DeRose <Melonie.DeRose@LanierLawFirm.com>

Subject: RE: State of Texas v Google - Deposition Notices

Counsel,

The Plaintiff States hereby serve the attached Notices of Deposition for the following deponents in the *State of Texas et al. v. Google LLC* case, No. 4:20-cv-00957-SDJ:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Thank you.

Audrey



Audrey Moore
Paralegal
p: 713-659-5200
10940 West Sam Houston Pkwy N, Suite 100
Houston • Texas • 77064
www.LanierLawFirm.com

Audrey Moore - Paralegal p: 713-659-5200 w: www.LanierLawFirm.com

This e-mail is confidential and may be legally privileged. If you have received it in error, you are on notice of its status. Please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it, use it for any purpose or disclose its contents to any other person; to do so could be a breach of confidentiality. Thank you for your cooperation. Please contact our IT Helpdesk at GlobalITServiceDesk@freshfields.com if you need assistance.

Freshfields Bruckhaus Deringer US LLP has offices in New York, Silicon Valley and Washington, DC. Freshfields Bruckhaus Deringer LLP is a limited liability partnership registered in England and Wales with registered number OC334789, and has offices or associated entities in Austria, Bahrain, Belgium, China, England, France, Germany, Hong Kong, Italy, Japan, the Netherlands, Singapore, Spain, the United Arab Emirates and Vietnam.

Any reference to a partner means a member, or a consultant or employee with equivalent standing and qualifications, of Freshfields Bruckhaus Deringer US LLP, Freshfields Bruckhaus Deringer LLP or any associated firms or entities.

For information about how Freshfields Bruckhaus Deringer processes personal data please refer to this [Privacy notice](#). For further information about Freshfields Bruckhaus Deringer, please refer to our website at www.freshfields.com.

CONFIDENTIALITY NOTICE: This email, including any attachments, is confidential and may be privileged. If you are not the intended recipient please notify the sender immediately, and please delete it; you should not copy it or use it for any purpose or disclose its contents to any other person. Norton Rose Fulbright entities reserve the right to monitor all email communications through their networks.

Norton Rose Fulbright Australia, Norton Rose Fulbright LLP, Norton Rose Fulbright Canada LLP, Norton Rose Fulbright South Africa Inc and Norton Rose Fulbright US LLP are separate legal entities and all of them are members of Norton Rose Fulbright Verein, a Swiss verein. Norton Rose Fulbright Verein helps coordinate the activities of the members but does not itself provide legal services to clients. Details of each entity, with certain regulatory information, are available at nortonrosefulbright.com.

Notice: The information contained in this electronic mail and any attached documents from Axinn, Veltrop & Harkrider LLP is confidential. This email may be an attorney-client communication, and as such is privileged and confidential. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the content of this information is prohibited. If you have received this electronic mail in error, please notify us immediately by telephone (212) 728-2200/(860) 275-8100 or by reply electronic mail to the sender. IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

This e-mail is confidential and may be legally privileged. If you have received it in error, you are on notice of its status. Please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it, use it for any purpose or disclose its contents to any other person; to do so could be a breach of confidentiality. Thank you for your cooperation. Please contact our IT Helpdesk at GlobalITServiceDesk@freshfields.com if you need assistance.

Freshfields Bruckhaus Deringer US LLP has offices in New York, Silicon Valley and Washington, DC. Freshfields Bruckhaus Deringer LLP is a limited liability partnership registered in England and Wales with registered number OC334789, and has offices or associated entities in Austria, Bahrain, Belgium, China, England, France, Germany, Hong Kong, Italy, Japan, the Netherlands, Singapore, Spain, the United Arab Emirates and Vietnam.

Any reference to a partner means a member, or a consultant or employee with equivalent standing and qualifications, of Freshfields Bruckhaus Deringer US LLP, Freshfields Bruckhaus Deringer LLP or any associated firms or entities.

For information about how Freshfields Bruckhaus Deringer processes personal data please refer to this [Privacy notice](#). For further information about Freshfields Bruckhaus Deringer, please refer to our website at www.freshfields.com.

This e-mail is confidential and may be legally privileged. If you have received it in error, you are on notice of its status. Please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it, use it for any purpose or disclose its contents to any other person; to do so could be a breach of confidentiality. Thank you for your cooperation. Please contact our IT Helpdesk at GlobalITServiceDesk@freshfields.com if you need assistance.

Freshfields Bruckhaus Deringer US LLP has offices in New York, Silicon Valley and Washington, DC. Freshfields Bruckhaus Deringer LLP is a limited liability partnership registered in England and Wales with registered number OC334789, and has offices or associated entities in Austria, Bahrain, Belgium, China, England, France, Germany, Hong Kong, Italy, Japan, the Netherlands, Singapore, Spain, the United Arab Emirates and Vietnam.

Any reference to a partner means a member, or a consultant or employee with equivalent standing and qualifications, of Freshfields Bruckhaus Deringer US LLP, Freshfields Bruckhaus Deringer LLP or any associated firms or entities.

For information about how Freshfields Bruckhaus Deringer processes personal data please refer to this [Privacy notice](#). For further information about Freshfields Bruckhaus Deringer, please refer to our website at www.freshfields.com.

This e-mail is confidential and may be legally privileged. If you have received it in error, you are on notice of its status. Please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it, use it for any purpose or disclose its contents to any other person; to do so could be a breach of confidentiality. Thank you for your cooperation. Please contact our IT Helpdesk at GlobalITServiceDesk@freshfields.com if you need assistance.

Freshfields Bruckhaus Deringer US LLP has offices in New York, Silicon Valley and Washington, DC. Freshfields Bruckhaus Deringer LLP is a limited liability partnership registered in England and Wales with registered number OC334789, and has offices or associated entities in Austria, Bahrain, Belgium, China, England, France, Germany, Hong Kong, Italy, Japan, the Netherlands, Singapore, Spain, the United Arab Emirates and Vietnam.

Any reference to a partner means a member, or a consultant or employee with equivalent standing and qualifications, of Freshfields Bruckhaus Deringer US LLP, Freshfields Bruckhaus Deringer LLP or any associated firms or entities.

For information about how Freshfields Bruckhaus Deringer processes personal data please refer to this [Privacy notice](#). For further information about Freshfields Bruckhaus Deringer, please refer to our website at www.freshfields.com.